



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JAN 04 2016

**CERTIFIED MAIL 7009 1680 0000 7663 6063**  
**RETURN RECEIPT REQUESTED**

Mr. Glenn Janicki  
Administrative Director Illinois Control Laboratory  
ACL Laboratories  
5400 Pearl Street  
Rosemont, Illinois 60018

Re: Notice of Violation  
Compliance Evaluation Inspection  
ILR 000 170 027

Dear Mr. Janicki:

On September 26, 2016 a representative of the U.S. Environmental Protection Agency inspected the ACL Laboratories (ACL) facility located in Rosemont, Illinois. As a "large quantity generator" of hazardous waste, ACL is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate ACL's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by ACL, EPA's review of records pertaining to ACL, and the inspector's observations, EPA has determined that ACL has unlawfully stored hazardous waste without a permit or interim status as a result of ACL's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which ACL was out of compliance at the time of the inspection in paragraphs 1 through 5, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption condition identified in paragraphs 1 - 5 are also independent TSD requirements incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of ACL to comply

with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Ill. Admin. Code tit. 35 Part 724 [40 C.F.R. Part 264] (if the facility should have been permitted).

#### **STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS**

##### Management of Containers

1. Under Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(i); 725.273(a) [40 C.F.R. §§ 262.34(a)(1)(i); 265.173(a)], a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the waste is placed in containers and complies with the requirements of Subpart I; a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

At the time of the inspection, ACL was storing several containers in various SAAs that were not closed when hazardous waste was not being added to or removed from the containers. *See*, page 3; paragraph 2, Site Inspection.

##### Contingency Plan

2. Under Ill. Admin. Code tit. 35 § 722.134(a)(4); Subpart D, 35 § 725.152(e) [40 C.F.R. § 262.34(a)(4); Subpart D, § 265.52(e)], the contingency plan must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm system [internal and external], and decontamination equipment, where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

At the time of the inspection, ACL's contingency plan did not include a list of all emergency equipment, the capabilities of the equipment at the facility or where the equipment is located. *See*, page 4, Item 4. Site Inspection.

3. Under Ill. Admin. Code tit. 35 § 722.134(a)(4); Subpart D, 35 § 725.152(c) [40 C.F.R. § 262.34(a)(4); Subpart D, § 265.52(c)], the contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services.

At the time of the inspection, ACL's contingency plan did not describe arrangements with local police departments, fire departments, hospitals, contractors, or emergency response teams. *See*, page 10, RCRA Generator Inspection Checklist.

4. Under Ill. Admin. Code tit. 35 § 722.134(a)(4); Subpart D, 35 § 725.153(b) [40 C.F.R. § 262.34(a)(4); Subpart D, § 265.53(b)], a copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services.

At the time of the inspection, ACL's contingency plan, or its revisions, had not been submitted to all local authorities. *See*, page 4, Item 4, Site Inspection.

#### Preparedness and Prevention

5. Under Ill. Admin. Code tit. 35 § 722.134(a)(4); Subpart D, 35 § 725.137(a) [40 C.F.R. § 262.34(a)(4); Subpart D, § 265.37(a)], the owner or operator must attempt to make: 1) arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes; agreements with State emergency response teams, emergency response contractors and equipment suppliers; and, arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

At the time of the inspection, ACL did not have documentation that they had made arrangements with local emergency authorities, contractors, or local hospitals.

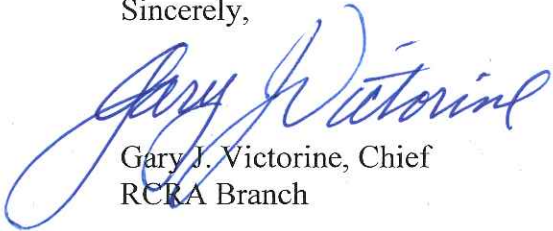
**Summary:** By failing to comply with the conditions for a permit exemption, above, ACL became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. ACL failed to apply for such a permit. ACL's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 is also an independent violation of the corresponding TSD requirement.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than thirty (30) days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and

requirements. You should submit your response to Ms. Jamie Paulin, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Paulin, of my staff, at 312-886-1771, or at [paulin.jamie@epa.gov](mailto:paulin.jamie@epa.gov).

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA, ([todd.marvel@illinois.gov](mailto:todd.marvel@illinois.gov))



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

**SITE NAME:** ACL Laboratories

**EPA ID No.:** ILR 000 170 027

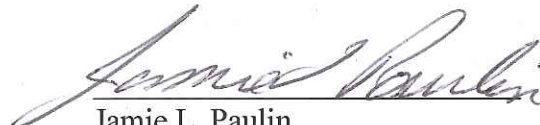
**LOCATION ADDRESS:** 5400 Pearl Street  
Rosemont, Illinois 60018

**NAICS CODE(S):** 622110 [General Medical and Surgical Hospitals]

**DATE OF INSPECTION:** September 26, 2016

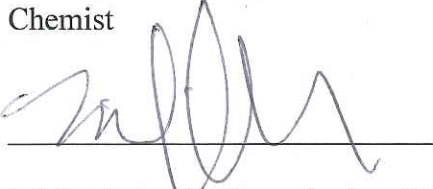
**EPA INSPECTOR:** Jamie L. Paulin  
Chemist  
LR-8J  
Compliance Section 1  
(312) 886-1771 Direct  
(312) 353-4788 Facsimile  
paulin.jamie@epa.gov

**PREPARED BY:**

  
Jamie L. Paulin  
Chemist

10/19/16  
Date

**APPROVED BY:**

  
Michael Cunningham, Section Chief  
Compliance Section 1  
RCRA Branch

10/30/16  
Date

## INTRODUCTION:

The purpose of the inspection was to conduct an un-announced Compliance Evaluation Inspection (CEI) at the ACL Laboratories (ACL) facility, located at 5400 Pearl Street, Rosemont, Illinois, to examine ACL's management of its Resource Conservation and Recovery Act (RCRA) regulated waste, and to determine ACL's compliance with RCRA, including used oil regulations.

- ACL notified EPA that it was a large quantity generator (LQG) of hazardous waste on or about 3/1/2012. They remain an LQG.
- They operate as a clinical laboratory performing testing and analyses on biological samples and they do not conduct research.
- They generate various types of hazardous waste from the laboratory, such as flammable solvents, metal hazardous waste and some U-coded waste.
- They have a formalin neutralizer on-site and discharge down the sink to the local POTW.
- They had never been inspected by the State RCRA program staff or by the EPA RCRA program staff prior to this inspection.
- They employ about 400 people and operate 3 shifts, 7 days per week.

## OPENING CONFERENCE:

I entered the ACL facility at 9:20am on September 26, 2016. I introduced myself, presented my credentials, and described the purpose of my visit. After about a 15 minute wait, Mr. Glenn Janicki, Administrative Director Illinois Control Laboratory, and Mr. Matt Clark, Administrative Director Support Operations, met with me and escorted me to a conference room for our opening conference.

Neither Mr. Janicki nor Mr. Clark made a CBI claim on the information gathered during the inspection or on the photos taken, documents copied and/or verbal information provided.

Mr. Janicki explained that ACL is a clinical laboratory that acts as a central laboratory to various hospital systems. No research was being conducted here. The laboratory was testing various biological samples using multiple instruments and analyses.

He further explained that all hazardous wastes are collected in satellite accumulation areas (SAAs) and not put down the sinks of the various labs. They were also storing universal waste and only small containers of hazardous waste in the different SAAs throughout the different labs. No centralized hazardous waste storage area was located on site at the time of the inspection. Stericycle picks up the hazardous waste several times per week directly from the SAAs,

according to Mr. Janicki. They also take all of their wastes off-site for them, including bio waste. Stericycle has categorized all of the lab hazardous waste for ACL. They have profiled the various waste and create all of the manifests as well. ACL lab staff separate their waste with like wastes for storage, as Stericycle has determined, after a full review of all of the hazardous wastes. We began the physical site inspection immediately following the opening conference.

## **SITE INSPECTION:**

Mr. Janicki and Mr. Clark both escorted me on the physical site inspection, which began in the Cytogenetic Lab, Room 350B. Various SAA containers were being stored near or underneath laboratory instruments. The laboratory manager explained that the hazardous waste is collected in containers through tubes while the instrument is running. Then the content is poured into an SAA container after the run. However, some of the containers attached to the instruments via tubes were open and still contained hazardous waste, even though the instruments were no longer running. *See*, photographs 1 through 4.

We then proceeded to the Microbiology Lab, Room 278. Various SAA containers were being stored near or underneath laboratory instruments. *See*, photograph 5.

From there, we entered the Molecular Genetics Lab, Room 217. Non-hazardous waste containers were being stored within the laboratory. A storage room was located in the lab that contained red-bag waste and non-hazardous waste. *See*, photographs 6 and 7.

I inspected the Core Lab, room 221 next. This lab was storing several SAA containers in flammable cabinets and on the floor in various parts of the lab. They were also operating a xylene recycler for re-use of xylene in the lab. The xylene recycling process did not generate a waste or discharge. Formalin, which contains formaldehyde, was also being neutralized in this lab and then discharged down the sink to the sewer system. *See*, photographs 8 through 13.

Lastly, ACL was not storing any universal waste on-site at the time of the inspection. The Core Lab was the last area to be inspected. We returned to the front office conference room.

## **RECORDS REVIEW:**

Mr. Janicki and Mr. Clark both aided me with the review of the records after completing the physical site inspection.

### **1. Personnel Training**

Stericycle was conducting DOT training to employees that manage hazardous waste on an annual basis for the years of 2014, 2015 and 2016. ACL was also conducting OSHA Hazardous Communication to all employees on an annual basis, which included classification and labeling of chemicals; and chemical waste.

However, the training did not include emergency response and contingency plan implementation.

## **2. Manifests**

I reviewed the manifests of the hazardous waste shipments for the years 2015, and 2016. ACL was shipping hazardous waste off-site several times per week. ACL did not have final signed copies from the treatment, storage, disposal facilities of five manifests:

- 015664853 JJK 5/31/16
- 015987062 JJK 6/20/16
- 015991060 JJK 6/6/16
- 015991328 JJK 6/16/16
- 015991061 JJK 6/9/16

Mr. Clark sent me the final copies on 9/29/16 and explained that the copies were located in the manifest binders; however were misplaced.

## **3. Waste Analysis and Recordkeeping**

I observed that ACL did have, as a record, a land disposal restriction (LDR) notification form for shipments of hazardous waste.

## **4. Contingency Plan**

An Emergency Management Plan was available for my review during the inspection; however, the plan did not include a list of all emergency equipment, the capabilities of the equipment at the facility or where the equipment is required. Copies of the contingency plan and all revisions had not been submitted to all local authorities. ACL did have job titles and job descriptions on-site.

## **5. Preparedness and Prevention**

Arrangements with local emergency authorities, contractors, or local hospitals were not available for my review during the inspection.

## **6. Annual Reporting**

ACL had filed an annual hazardous waste report with the Illinois Environmental Protection Agency by March 1 for the reporting years 2013, 2014 and 2015. They are currently listed as an LQG within the EPA's RCRAInfo database.

## **7. Weekly and Daily Inspections**

At the time of the inspection, ACL was not conducting weekly inspections of the hazardous



waste storage areas because they did not have a centralized hazardous waste storage area. All of their hazardous wastes were being stored in SAAs at the time of the inspection.

**CLOSING CONFERENCE:**

I conducted the closing conference with Mr. Janicki and Mr. Clark. I explained to them that I would need to review my notes and photographs before making any compliance decisions. I also explained that I would submit a copy of my inspection report along with the photo log to ACL.

I departed ACL around 1:45pm.

**ATTACHMENT: (2)**

Attachment 1	Photographs taken during the time of the inspection.
Attachment 2	Inspection Check list.

**ENCLOSURE**



# Photographs for ACL Laboratories CEI 9/26/2016

## Media: RCRA

**Disk Number** 1  
**Photo Number** 1  
**Photo Filename** DSCN1048.JPG  
**Date/Time** 9/26/2016  
10:31:00 AM  
**Photographer** Jamie Paulin

### Description

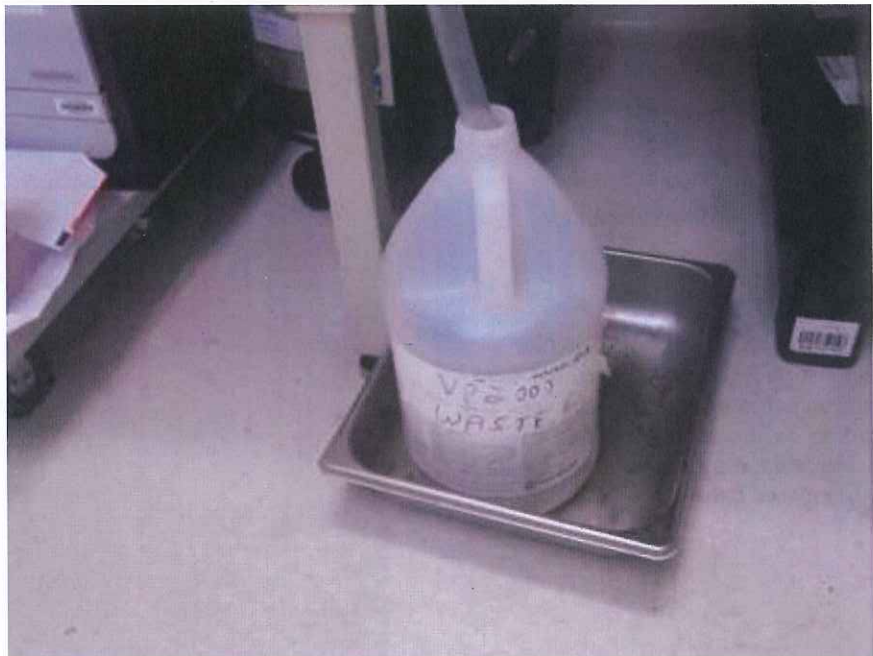
Cytogenetic Lab Room 350B. Satellite Accumulation Area (SAA) containers were located underneath various instruments. The hazardous waste was collected into a container while the instrument was running and then placed into a closed, labeled container.



**Disk Number** 1  
**Photo Number** 2  
**Photo Filename** DSCN1049.JPG  
**Date/Time** 9/26/2016  
10:31:00 AM  
**Photographer** Jamie Paulin

### Description

Cytogenetic Lab Room 350B. Satellite Accumulation Area (SAA) containers were located underneath various instruments. The hazardous waste was collected into a container while the instrument was running and then placed into a closed, labeled container.



# Photographs for ACL Laboratories CEI 9/26/2016

## Media: RCRA

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**Disk Number** 1  
**Photo Number** 3  
**Photo Filename** DSCN1050.JPG  
**Date/Time** 9/26/2016  
10:33:00 AM  
**Photographer** Jamie Paulin

### Description

Cytogenetic Lab Room 350B. Another SAA container was being stored in the lab, with a volume of about 30 gallons.



**Disk Number** 1  
**Photo Number** 4  
**Photo Filename** DSCN1051.JPG  
**Date/Time** 9/26/2016  
10:34:00 AM  
**Photographer** Jamie Paulin

### Description

Cytogenetic Lab Room 350B. Satellite Accumulation Area (SAA) containers were located underneath various instruments. The hazardous waste was collected into a container while the instrument was running and then placed into a closed, labeled container.





# Photographs for ACL Laboratories CEI 9/26/2016

## Media: RCRA

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**Disk Number** 1  
**Photo Number** 5  
**Photo Filename** DSCN1052.JPG  
**Date/Time** 9/26/2016  
10:41:00 AM  
**Photographer** Jamie Paulin

### Description

Microbiology Lab Room 278. An SAA container was located underneath various instruments. The hazardous waste was collected into a container stored underneath the counters.



**Disk Number** 1  
**Photo Number** 6  
**Photo Filename** DSCN1053.JPG  
**Date/Time** 9/26/2016  
10:47:00 AM  
**Photographer** Jamie Paulin

### Description

Molecular Genetics Lab Room 217. Non-hazardous waste containers were being stored within the laboratory.



# Photographs for ACL Laboratories CEI 9/26/2016

## Media: RCRA

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**Disk Number** 1  
**Photo Number** 7  
**Photo Filename** DSCN1054.JPG  
**Date/Time** 9/26/2016  
10:50:00 AM  
**Photographer** Jamie Paulin

### Description

Storage Room, Room 230. Red bag waste and non-hazardous waste were being stored inside of the storage room.



**Disk Number** 1  
**Photo Number** 8  
**Photo Filename** DSCN1055.JPG  
**Date/Time** 9/26/2016  
10:52:00 AM  
**Photographer** Jamie Paulin

### Description

Core Lab Room 221. SAA containers of hazardous waste were being stored in a flammable cabinet.





# Photographs for ACL Laboratories CEI 9/26/2016

## Media: RCRA

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**Disk Number** 1  
**Photo Number** 9  
**Photo Filename** DSCN1056.JPG  
**Date/Time** 9/26/2016  
10:56:00 AM  
**Photographer** Jamie Paulin

### Description

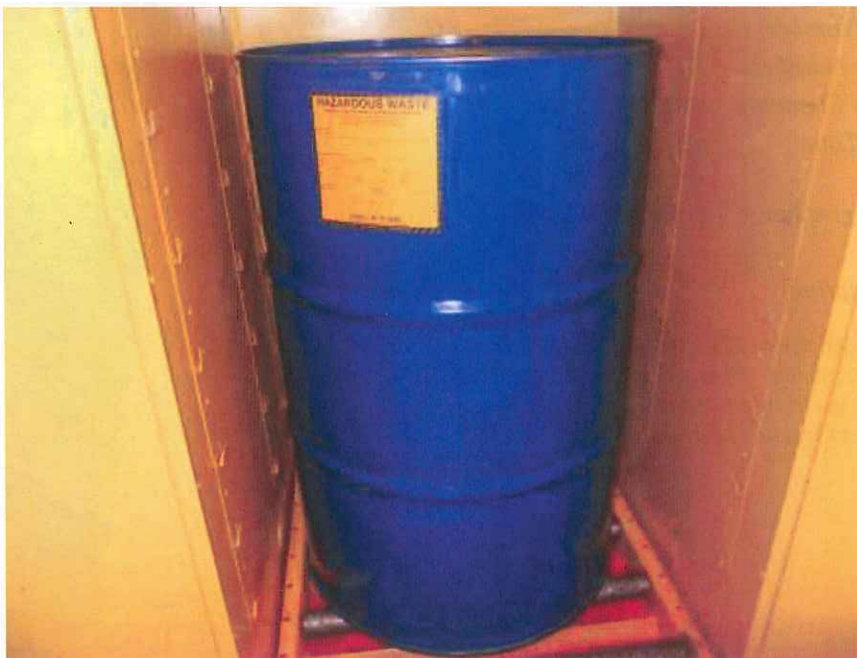
Core Lab Room 221. Xylene was being recycled for re-use within the lab.



**Disk Number** 1  
**Photo Number** 10  
**Photo Filename** DSCN1057.JPG  
**Date/Time** 9/26/2016  
10:58:00 AM  
**Photographer** Jamie Paulin

### Description

Core Lab Room 221. One 55-gallon SAA container of hazardous waste (flammable xylene waste) was being stored inside of a flammable cabinet.



# Photographs for ACL Laboratories CEI 9/26/2016

## Media: RCRA

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**Disk Number** 1  
**Photo Number** 11  
**Photo Filename** DSCN1058.JPG  
**Date/Time** 9/26/2016  
10:58:00 AM  
**Photographer** Jamie Paulin

### Description

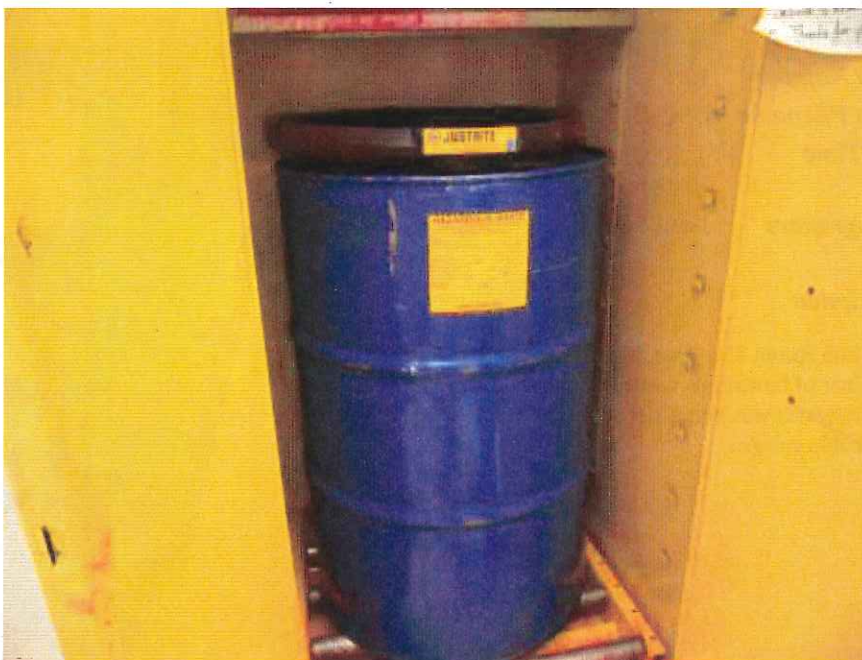
Core Lab Room 221. Formalin (formaldehyde) was being neutralized and then discarded down the sink.



**Disk Number** 1  
**Photo Number** 12  
**Photo Filename** DSCN1059.JPG  
**Date/Time** 9/26/2016  
10:59:00 AM  
**Photographer** Jamie Paulin

### Description

Core Lab Room 221. Another 55-gallon SAA container of hazardous waste was being stored inside of a flammable cabinet in a different location of the laboratory.





# Photographs for ACL Laboratories CEI 9/26/2016

**Media: RCRA**

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*Disk Number* 1  
*Photo Number* 13  
*Photo Filename* DSCN1060.JPG  
*Date/Time* 9/26/2016  
11:00:00 AM  
*Photographer* Jamie Paulin

## *Description*

Core Lab Room 221. Another 55-gallon SAA container of hazardous waste was being stored inside in a different location of the laboratory.





Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (&gt;1000 KG/MO.)</b>	
	<b>SUBPART A: GENERAL</b>	
722.111	<b>Section 722.111 Hazardous Waste Determination</b> Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	<b>Section 722.112 USEPA Identification Numbers</b> Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a)
722.112(a)		722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	<b>SUBPART B: THE MANIFEST</b>	
722.120(a)	<b>Section 722.120 General Requirements</b> Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.120(b)
	<b>Section 722.121 Acquisition of Manifests</b> Has the generator used:	722.120(d)
722.121(a)	- an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
722.122	<b>Section 722.122 Number of Copies</b> Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	<b>Section 722.123 Use of the Manifest</b> For each manifest reviewed, has the generator:	
	- signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
	- retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b>	
722.130	Is there any hazardous waste ready for transport off-site? Yes _____ No <input checked="" type="checkbox"/> N/A _____	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(722.134(a))	<b>Section 722.134 Accumulation Time</b> Has the generator complied with the following requirements: Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:  Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No _____ N/A _____ If "No", go to Subpart J.	
	<b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b>	
(725.211)	Has the generator closed an accumulation area? Yes _____ No <input checked="" type="checkbox"/> N/A _____	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A _____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes _____ No <input checked="" type="checkbox"/> N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?  Yes _____ No _____ N/A <u>✓</u></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)  Yes <u>✓</u> No _____ N/A _____</p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?  Yes <u>✓</u> No _____ N/A _____</p> <p><b>Note:</b> See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes?  Yes <u>✓</u> No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.278)	<p><b>Section 725.278 Air Emission Standards</b></p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725?  Yes _____ No _____ N/A <u>✓</u></p> <p>Comments:</p> <p>Does the generator accumulate and/or treat hazardous waste in tanks?  Yes _____ No <u>✓</u> N/A _____</p> <p><b>Note:</b> If "No", go to Subpart C.</p> <p><b>SUBPART J: TANK SYSTEMS</b></p> <p>Has the generator closed an accumulation area?  Yes _____ No _____ N/A _____</p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?  Yes _____ No _____ N/A _____</p>	
(725.211)		725.211
(725.214)		725.214
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks <b>existing</b> prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____ 3) existing corrosion protection measures? Yes _____ No _____ N/A _____ 4) documented age of the tank system? Yes _____ No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____  *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____  <b>Note:</b> If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For <b>new</b> tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service?  Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89?  Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later?  Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95?  Yes _____ No _____ N/A _____</p> <p>or</p> <p>if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later?  Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87?  Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?  Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?  Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> <li>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure?  Yes _____ No _____ N/A _____</li> <li>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift?  Yes _____ No _____ N/A _____</li> <li>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours?  Yes _____ No _____ N/A _____</li> <li>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation?  Yes _____ No _____ N/A _____</li> </ol> <p>and</p> <p>is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> <li>1) a liner (external to the tank); or</li> <li>2) a vault; or</li> <li>3) a double-walled tank; or</li> <li>4) an equivalent device (approved by the Board)?  Yes _____ No _____ N/A _____</li> </ol>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)?  Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) overfill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(c))	<p><b>Note:</b> If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A _____</p>	



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release?  Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection?  Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water?  Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release?  Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system?  Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment?  Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair?  Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection?  Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]?  Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?  Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system?  Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:  - the resulting waste, mixture or dissolved material is no longer ignitable or reactive?  Yes _____ No _____ N/A _____</p> <p>- Section 725.117(b) is complied with?  Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction?  Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies?  Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line?  Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank?  Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with?  Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with?  Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p><b>Section 725.302 Air Emission Standards</b></p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725?  Yes _____ No _____ N/A _____</p> <p>Comments:</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	<b>SUBPART C: PREPAREDNESS AND PREVENTION</b> Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
	<b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b>	
(725.151(a))	Is the contingency plan available? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
	If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> <li>- police and fire departments? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>- hospitals? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>- contractors? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>- emergency response teams? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> <li>- description? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>- capability? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>- location? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> </ul> <p>Is the list of emergency equipment up-to-date?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> <li>- an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <ul style="list-style-type: none"> <li>a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>b) submitted to: <ul style="list-style-type: none"> <li>- police department? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>- fire department? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>- hospital? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> <li>- emergency response teams? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> </ul> </li> </ul>	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <ul style="list-style-type: none"> <li>a) regulations are revised? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> <li>b) the plan fails in an emergency? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> <li>c) the facility changes in a way that modifies the emergency response necessary? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> <li>d) information regarding emergency coordinators changes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> <li>e) information regarding equipment changes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> </ul>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?</p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> If the facility has had a release, explain in detail.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p><b>Section 725.116 Personnel Training</b></p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> <li>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- response to groundwater contamination incidents? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/></li> <li>- shutdown of operations? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ol>	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	<p><b>Section 728.107 Waste Analysis and Recordkeeping</b></p> <p>Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Is the plan on-site?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the plan include a detailed physical and chemical analysis?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
722.134(c)	<p><b>Section 722.134 Satellite Accumulation</b></p> <p>Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste complied with the requirements of Section 722.134(a) within 3 working days?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>If there are more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
722.134(g)	<p><b>Note:</b> A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.</p> <p><b>SUBPART D: RECORDKEEPING AND REPORTING</b></p>	
722.140(a)	<p><b>Section 722.140 Recordkeeping</b></p> <p>Has the generator retained for a period of 3 years:  - a copy of each signed manifest?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(a)
722.140(b)	<p>Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(b)
722.140(c)	<p>Has the generator retained for a period of 3 years:  - copies of test results, waste analyses or other determinations made in accordance with Section 722.111?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(c)
722.140(d)	<p>Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)?  Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.140(d)
722.141(a)	<p><b>Section 722.141 Annual Reporting</b></p> <p>Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p><b>Note:</b> If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.</p>	722.141(a)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.142(a)(1)	<b>Section 722.142 Exception Reporting</b> If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.141(b)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.142(a)(2)
722.150	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b> Is the generator an exporter of hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.143
722.160	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b> Is the generator an importer of hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.150
722.170	<b>SUBPART G: FARMERS</b> Is the generator a farmer? Yes _____ No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes _____ No _____ N/A <input checked="" type="checkbox"/>  COMMENTS:	722.160
		722.170





Production Area	Description	Area Requested From	Date Received	EPA Document Number	CBI Claimed	Pages Obtained
General	Advocate Health Care Position Description and Job Title	Records	9/26/2016	JP-AC-01-16	No	7
General	Stericycle US DOT Regulated Medical Waste Employee Training Certificate Test	Records	9/26/2016	JP-AC-02-16	No	3
General	ACL Spill Procedures Reference #1009, Version #3	Records	9/26/2016	JP-AC-03-16	No	17
General	OSHA Hazardous Communication Training Records	Records	9/26/2016	JP-AC-04-16	No	9
General	ACL Emergency Management Plan - IL Central Laboratory, Reference #959, Version#3	Records	9/26/2016	JP-AC-05-16	No	3
General	Emergency Response Plan Bomb Threat	Records	9/26/2016	JP-AC-06-16	No	23
General	Chemical Waste Training April 26, 2016	Records	9/26/2016	JP-AC-07-16	No	8
General	Injury and Accident Reporting, Reference #981, Version#2	Records	9/26/2016	JP-AC-08-16	No	3

